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December 23, 2024

VIA ECF

Hon. Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Defendant's Letter Motion is hereby GRANTED. This case shall be stayed until March 21, 2025. Summary judgment motions are due by April 21, 2025. Oppositions are due by May 21, 2025. Replies are due by June 4, 2025. Defendant's Answer to the Complaint is due by April 14, 2025. The parties shall file a joint status letter updating the Court on their settlement negotiations by March 21, 2025.

SO ORDERED:

Re: *A.K. v. New York City Public Schools*, 24-cv-8255 (JHR)(KHP)

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

12/26/2024

Dear Magistrate Judge Parker:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day stay of this action, including the briefing schedule set by the Court, until March 21, 2025. Plaintiff consents to this request, and provided the needed billing records and retainer agreement on Dec. 21, 2024. On November 1, 2024, the Court set a briefing schedule for summary judgment motions. (ECF 8). (Motions due March 3, 2025; Oppositions due April 3, 2025; Replies due April 17, 2025). On November 19, 2024, the Court granted Defendant's first request for an extension of the Answer deadline. (ECF 11). (Defendant's deadline to respond to the Complaint is currently February 24, 2025). Pursuant to the Court's ECF 12 Order, a joint settlement update is due by January 3, 2025.

We note that, while this is an IDEA fees-only case and liability appears not at issue, without the relevant billing, Defendant was not able to begin its internal settlement review process. Now that Plaintiff provided the needed billing records, Defendant will proceed with this review, which includes review of the underlying administrative record together with the relevant billing records and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice, conferences or even the need to file an Answer. The parties are hopeful this matter will be resolved as well.

I also respectfully propose that, if a stay is granted, the parties be required to submit a joint status letter regarding settlement negotiations on or before March 21, 2025.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)